

April 19, 1999

Mr. Al McCloud  
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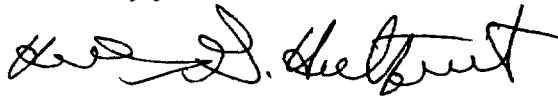
**Re: In the Matters of New York Department of Public Service Petition for Additional Authority to Implement Number Conservation Measures, NSD File No. L-99-21; Massachusetts Department of Telecommunications and Energy Request for Additional Authority to Implement Various Area Code Conservation Measures in the 508, 617, 781, and 978 Area Codes, NSD File No. L-99-19; Massachusetts Department of Telecommunications and Energy Petition for Waiver to Implement a Technology Specific Overlay in the 508, 617, 781, and 978 Area Codes, NSD File No. L-99-17; Petition for Declaratory Ruling and Request for Expedited Action On the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215 and 717, NSD File No. L-97-42; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98**

Dear Mr. McCloud:

Enclosed herewith for filing are the original and four (4) copies of MCI WorldCom's Reply Comments regarding the above-captioned matters.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI WorldCom Comments furnished for such purpose and remit same to the bearer.

Sincerely yours,



Henry G. Hultquist

Enclosure  
HGH

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List A B C D E

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matters of:	)	
	)	
New York Department of Public Service	)	
Petition for Additional Authority to	)	NSD File No. L-99-21
Implement Number Conservation Measures	)	
	)	
Massachusetts Department of	)	
Telecommunications and Energy	)	
Request for Additional Authority to	)	NSD File No. L-99-19
Implement Various Area Code Conservation	)	
Measures in the 508, 617, 781, and 978	)	
Areas Codes	)	
	)	
Massachusetts Department of	)	
Telecommunications and Energy	)	NSD File No. L-99-17
Petition for Waiver to Implement a	)	
Technology Specific Overlay in the	)	
508, 617, 781, and 978 Area Codes	)	
	)	
Petition for Declaratory Ruling and Request	)	
for Expedited Action On the July 15, 1997	)	
Order of the Pennsylvania Public Utility	)	NSD File No. L-97-42
Commission Regarding Area Codes	)	
412, 610, 215 and 717	)	
	)	
Implementation of the Local Competition	)	
Provisions of the Telecommunications	)	CC Docket No. 96-98
Act of 1996	)	

**REPLY COMMENTS OF  
MCI WORLDCom, INC**

MCI WorldCom, Inc. (MCI WorldCom) hereby submits reply comments pursuant to the Commission's Public Notices in the above captioned matters.<sup>1</sup> MCI WorldCom agrees with the many commenters who recognized the importance of establishing national policies for number administration, and thereby preserving the unity on the North American Numbering Plan

(NANP).<sup>2</sup> Rapid area code exhaust is a problem throughout the country. The New York Department of Public Service (NYDPS) and the Massachusetts Department of Telecommunications and Energy (MDTE) have correctly diagnosed the cause: inefficient number assignment practices. However, this national problem requires a national solution. The Commission is addressing these issues in the NRO proceeding. Decisive and timely action by the Commission to establish a national framework for pooling, will address the concerns of the NYDPS, the MDTE, and other states without sacrificing the consistent administration of the NANP.

In these Reply Comments, MCI WorldCom will address one issue about which some confusion has arisen. Several commenters have argued that state commissions should not be permitted to require that carriers participate in interim unassigned number portability (UNP).<sup>3</sup> Indeed, BellSouth maintains that UNP "should never be deployed."<sup>4</sup> According to many of these commenters, significant administrative barriers must be overcome before UNP can be deployed.<sup>5</sup> While MCI WorldCom agrees that some forms of UNP may require significant time and/or development, we envision unassigned number porting in response to specific customer requests, as requiring small initial volumes supportable, if necessary, by work-around processes in carrier procedures.

MCI WorldCom has consistently advocated a three-tiered approach to UNP.<sup>6</sup> In Phase 1, UNP may occur between two carriers when the request is for numbers within a specific NPA-NXX. Carriers would utilize the existing local service request form to enter a description of the

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<sup>1</sup> Public Notice DA 99-462 (released March 5, 1999), Public Notice DA 99-461 (released March 5, 1999), and Public Notice DA 99-460 (released March 4, 1999).

<sup>2</sup> See, e.g., Comments of AT&T Corp. on Petitions for Waiver at 4-7; or Comments of the Personal Communications Industry Association at 4-7.

<sup>3</sup> See, e.g., Comments of Level 3 Communications, Inc. at 9.

<sup>4</sup> BellSouth Comments at 5.

<sup>5</sup> See, e.g., Comments of AT&T Corp. on Petitions for Waiver at 12.

telephone number characteristics desired and the Firm Order Confirmation to enter a list of the telephone numbers to be ported. Carriers could make requests only for specific customer needs. This is a minor change that should be easily adapted to current inter-carrier ordering processes. By requiring service providers to request from a specific NPA-NXX, Phase 1 limits the potential source of telephone numbers to a single provider who can fill the request. By utilizing existing forms and processes, Phase 1 does not entail significant additional costs for carriers or end users. Further, incumbent carriers now claim that UNP cannot be supported in ordering systems because no account is established for spare numbers. In response, MCI WorldCom submits that work-around processes should suffice, given the small volumes anticipated in Phase 1. There are instances in which numbers are currently activated for network use and testing and those same procedures should be able to facilitate initial UNP methods.

In Phase 2, the Commission would approve selection of a third-party administrator to distribute requests when more than one service provider can supply the requested telephone numbers. Requests could either be rate-area wide or merely NPA specific, but would continue to be limited to specific customer needs. Phase 3 would introduce a mechanized process between the third party administrator and service providers as volumes increase, and would permit requests for inventory build-up, as a substitute for new NXX assignments.

Phase 1 of UNP is a significantly pro-competitive policy that provides all customers with access to numbers that might otherwise remain stranded in carrier inventories, and may also provide some number conservation benefits. It utilizes existing, industry-standard procedures and technology to help ensure that particular customers have access to the numbers of their choice, regardless of which carrier currently has those numbers in its inventory. It does not require development of burdensome new administrative procedures, nor will it “cause chaos in

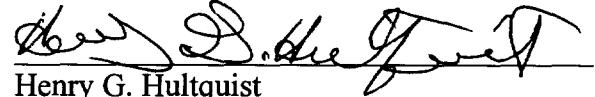
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<sup>6</sup> See, e.g., Comments of MCI WorldCom at 5.

the industry.”<sup>7</sup> The Commission should address Phases 2 and 3 in the NRO proceeding.

However, it should not prevent pro-competitive states from moving ahead with Phase 1 in the meantime.

Respectfully submitted,  
MCI WorldCom, Inc.

A handwritten signature in black ink, appearing to read "Henry G. Hultquist", written over a horizontal line.

Henry G. Hultquist  
Mary De Luca  
1801 Pennsylvania Avenue, NW  
Washington, DC 2006  
(202)887-2502

April 19, 1999

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<sup>7</sup> BellSouth Comments at 5.

## **CERTIFICATE OF SERVICE**

I, Barbara Nowlin, do hereby certify that copies of the foregoing Reply Comments of MCI WorldCom, Inc. were sent via first class mail, postage paid, to the following on this 19th day of April, 1999.

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